

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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ZEQIU WU, Individually and on Behalf of :  
All Others Similarly Situated, :  
: Plaintiff, :  
: vs : 20-cv-4457 (ES) (CLW)  
: :  
GSX TECHEDU INC., LARRY :  
XIANGDONG CHEN, and NAN SHEN, :  
: Defendants. :  
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**STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULING**

**WHEREAS**, Plaintiff commenced this putative securities class action on April 17, 2020;

**WHEREAS**, because this action asserts claims under the Securities Exchange Act of 1934, 15 U.S.C. § 78a et seq., it is subject to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”);

**WHEREAS**, the PSLRA provides for, among other things, appointment of a lead plaintiff, 15 U.S.C. § 77u-4(a)(3), and a stay of all discovery pending resolution of any motions to dismiss, *id.* § 77u-4(b)(3)(B);

**WHEREAS**, lead plaintiff motions are due on or before June 16, 2020, *see id.* § 77u-4(a)(3)(A)(i)(II); and

**WHEREAS**, the undersigned parties have conferred regarding service and scheduling.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned parties, as follows:

1. Defendant GSX Techedu Inc. (“GSX”) hereby accepts service of the summons and complaint in this action, without prejudice to or waiver of any of defenses, objections or arguments, except as to sufficiency of service of process.<sup>1</sup>
2. GSX’s time to answer, move against or otherwise respond to any complaint in this action is stayed pending appointment of a lead plaintiff.
3. Once a lead plaintiff has been appointed, GSX will promptly confer with the lead plaintiff regarding a schedule for an amended complaint, if any, and GSX’s response.

DATED: May 22, 2020

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*Counsel for Defendant GSX Techedu Inc.*

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2020

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HONORABLE ESTHER SALAS  
UNITED STATES DISTRICT JUDGE

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<sup>1</sup> Defendants Larry Xiangdong Chen and Nan Shen have not been served and are not parties to this stipulation and proposed order.